UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

PRO-LIFE ACTION MINISTRIES, LUCY MALONEY, THOMAS WILKIN, and DEBRA BRAUN,

Case No. 23-CV-00853 (ECT/DJF)

Plaintiffs,

v.

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS

CITY OF MINNEAPOLIS, a Minnesota municipality,

Defendant.

As prevailing parties, Plaintiffs Pro-Life Action Ministries, Lucy Maloney, Thomas Wilkin, and Debra Braun request that this Court issue an Order awarding Plaintiffs their reasonable costs including attorneys' fees and expenses under 42 U.S.C. § 1988 and Rule 54(d)(2) of the Federal Rules of Civil Procedure, as argued in Plaintiffs' accompanying Memorandum and supporting declarations and exhibits.

Pursuant to Rule 54(d)(2), Plaintiffs assert that they are entitled to their fees and costs because this Court issued judgment in favor of Plaintiffs and against the City of Minneapolis on December 19, 2024. Dkt. 101. Accordingly, they prevailed on their civil rights claims made under 42 U.S.C. § 1983 and are entitled to their fees and costs under 42 U.S.C. § 1988. See Dkt. 7 at 18, 27, 29 (asserting claims under 42 U.S.C. § 1983).

Plaintiffs seek a reasonable attorneys' fee of \$791,427.50 and costs totaling \$60,661.34.

This Motion is made pursuant to the Federal Rules of Civil Procedure, District of Minnesota LR 7.1, and upon the files, records, and proceedings herein, as well as the arguments of counsel.

Respectfully submitted, this <u>18th</u> day of February, 2025.

/s/ B. Tyler Brooks
Peter Breen†
Joan Mannix†
B. Tyler Brooks†
Nathan Loyd†
THOMAS MORE SOCIETY
309 W. Washington Street
Suite 1250
Chicago, IL 60606
Telephone: (312) 782-1680
Fax: (336) 900-6535
pbreen@thomasmoresociety.org
jmannix@thomasmoresociety.org
tbrooks@thomasmoresociety.org
nloyd@thomasmoresociety.org

Erick G Kaardal
Elizabeth A. Nielson
MOHRMAN, KAARDAL & ERICKSON, P.A.
150 South Fifth Street
Suite 3100
Minneapolis, MN 55402
Telephone: (612) 465-0927
Fax: 612-341-1076
kaardal@mklaw.com
nielson@mklaw.com

[†] admitted *pro hac vice*

Attorneys for Plaintiffs